

THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007 Nicholas R. Ciappetta Administrative Law and Regulatory Litigation Division (212) 356-4036 nciappet@law.nyc.gov

November 14, 2022

BY ECF

Hon. Sylvia O. Hinds-Radix

Corporation Counsel

Honorable Miroslav Lovric United States Magistrate Judge United States District Court Northern District of New York 15 Henry Street Binghamton, New York 13901

Re: New Yorkers for Constitutional Freedoms, et al. v. Steven A. Nigrelli, et al.,

22 CV 1037 (TJM)(ML)

Dear Judge Lovric:

I am an attorney in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. I submit this letter on behalf of Defendant Eric Gonzalez, District Attorney for the County of Kings, sued herein in his official capacity.

This Office seeks additional time to respond to the Amended Complaint, filed on November 3, 2022. The current deadline to respond to the Amended Complaint is November 17, 2022. Defendant Gonzalez respectfully requests that the deadline to respond be extended to December 2, 2022. I have spoken with counsel for Plaintiffs who consents to this request.

Thank you in advance for your consideration of this matter.

Nicholas Ciappetta Senior Counsel

pectfully submitted?